

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 07-
	:	
v.	:	DATE FILED:
	:	
TONY STRONG	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (Hobbs Act extortion -
	:	1 count)
	:	21 U.S.C. § 846 (attempted distribution
	:	of controlled substances – 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Pennsylvania Department of Corrections (“the PDC”) was a branch of the government of the Commonwealth of Pennsylvania.
2. The State Correctional Institution at Graterford (“SCI Graterford”) was part of the PDC and was located in Graterford, Pennsylvania, in the Eastern District of Pennsylvania. SCI Graterford housed prisoners convicted of criminal conduct in the courts of the Commonwealth of Pennsylvania.
3. Defendant TONY STRONG was a corrections officer at SCI Graterford.
4. Corrections officers were responsible for guarding the prisoners housed at SCI Graterford.
5. Corrections officers at SCI Graterford were required to follow the rules

and regulations established for the operation of the prison and to ensure that prisoners followed these rules and regulations.

6. The PDC required all prison employees, including corrections officers, to abide by the Department of Corrections Code of Ethics which explicitly prohibited the following:

a. “any personal business transaction or private arrangements for personal profit which accrues from or is based upon his/her official position or authority. The scope of this provision shall include prohibition against entering into any type of business transaction or private arrangements with inmates;”

b. “solicit[ing], accept[ing], or agree[ing] to accept any gift of money or goods, loans or services for personal benefit which would influence the performance of their work duties or decision making. Correctional employees shall not accept or perform favors or accept or distribute any gifts, money or loans to or from inmates or members of an inmate’s family;”

c. “fraternization or private relationship of staff with inmates, parolees, or members of their families. This includes, but is not limited to trading, bartering or receiving gifts, money, and favors from either the inmate or the inmate’s friends, relatives or representative;” and

d. “[possessing] controlled substances . . . on state property or in any state Facility or vehicle.”

7. In violation of the Department of Corrections Code of Ethics as described above, defendant TONY STRONG received cash and other benefits from prisoners and their representatives, in exchange for smuggling contraband, including heroin and marijuana, into SCI

Graterford.

8. On or about February 9, 2007, in Fort Washington, in the Eastern District of Pennsylvania, and elsewhere, defendant

TONY STRONG

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that defendant STRONG obtained and attempted to obtain money, that is, \$150, which was not due defendant STRONG and his office, from another person, with that person's consent, under color of official right.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 7 of Count One are incorporated here.
2. On or about February 12, 2007, in Graterford, in the Eastern District of Pennsylvania, defendant

TONY STRONG

knowingly and intentionally attempted to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and knowingly and intentionally attempted to distribute, for remuneration, marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and (b)(1)(D).

In violation of Title 21, United States Code, Section 846.

NOTICE OF FORFEITURE

1. As a result of the violation of Title 21, United States Code, Section 846, set forth in this indictment, defendant

TONY STRONG

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense; and

(b) any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offense, including but not limited to the sum of \$150.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant,

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to

forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney